

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

BRANDON RICHARD BLEGEN,

Defendant.

Case No.: 19-CR-0304(1) (SRN/TNL)

**DEFENDANT'S MOTION FOR
DOWNWARD VARIANCE**

The Defendant, BRANDON RICHARD BLEGEN, by and through the undersigned counsel, hereby moves the Court pursuant to 18 U.S.C. §3553(a) for a downward variance from the otherwise applicable advisory guidelines range under the United States Sentencing Guidelines to a total sentence of no more than 180 months imprisonment. The grounds for this motion are set forth in defendant's sentencing memorandum.

Respectfully submitted,

DATED: May 12, 2020

GOETZ & ECKLAND P.A.

By: s/Frederick J. Goetz

FREDERICK J. GOETZ
Attorney Registration No. 185425
Banks Building
615 1st Avenue NE, Suite 425
Minneapolis, MN 55413
(612) 874-1552

ATTORNEY FOR DEFENDANT